

BILL 4549 REQUEST FOR IMPLEMENTATION

HISTORY OF THE PSYCHOLOGY RULE CHANGES FOR MASTER'S LEVEL LICENSING:

- Prior to 2010, there were rules regarding education program standards, practicum guidelines, and field experience. No competency exam was required.
- As of 2010, the addition of the Examination for Professional Practice of Psychology (EPPP) requirement was implemented on June 30, 2010.

CONFUSION BEGAN:

- Our group of graduates from Madonna University begin the program in 2006 & 2007. However, it is important to note students at other schools were also misinformed about the rule change.
- The rules as originally written were confusing, which resulted in misinterpretation by program administrators at various degree programs. (*See PowerPoint slides for rule wording*)
- Our professors and administrators, including our Ethics teacher, Dr. Patricia Watson, and past chair of the Board of Psychology, all confirm for us that we are "the last graduating class who will not be required to sit for the exam following the instigation of the new rules."
- We graduated and obtained our TLLP. Late summer of 2011, after most of us were employed and working towards our 2000 of experience, when we received a letter from LARA stating that we would indeed need to sit for the exam in order to qualify for our LLP licenses.

CONFUSION CONTINUED:

- Early 2012, one of our fellow graduates discovers two other master's level psychologists who graduated in 2010, from a different program in Michigan, received their LLP licenses **without** sitting for the exam.
- Other graduates from 5 other Michigan master's programs, were found who did the same thing. They applied for both licenses (TLLP & LLP) at the same time, thus beating the June 30, 2010 deadline for license application specified in the new rule.
- LARA would not acknowledge that this was allowed, nor would they allow the rest of us the same treatment. Our program director and Dr. Patricia Watson, vehemently expressed that this would have been **unethical** for LARA to have allowed, and again, we were very confused.
- Dr. Patricia Watson, sat on the board of psychology for 12 years, and was the Psychology Board chair as the new regulations took effect. Her reading of the regulation was the same as that of her successor to the chair position on the board, namely that individuals who applied for their first license at the time our group did should NOT have been required to take the exam.

ATTEMPTS TO SOLVE THE PROBLEM:

- Letters were written to directors of LARA, the governor's office, and the Board of Psychology chair at the time. Attorneys confirmed that we had a case, but then advised us that the best route to get results would be legislatively, due to time constraints on our TLLP licenses.
- Letters were written to each member of the board of psychology, legislators contacted, (State and Federal levels.) No one was successful at making LARA see the error, and correct it.
- Representative Howrylak and Amanda Gill, kindly offered to create this bill to help us finally move forward in our careers.

NEW RULES REGARDING EXAM REQUIREMENT (SEE POWER POINT SLIDES):

- **R 338.2505a (3)**
- **R 338.2507 Rule 7: (b)(ii)**

SO WHY WAS THE ROLL OUT OF THIS NEW RULE SO DIFFICULT TO UNDERSTAND?

- The bill was written in 2007, with the exam requirement (subrule) taking effect in 2010, and the LARA administration reiterates that exam is required for those who did NOT apply for Limited License prior to June 30, 2010. That they are required to follow adm. rule, "the law."
- LARA licensing directors responded to letters explaining: **"The Board was very concerned about the people who were already enrolled in master's degree programs so they selected an effective date of June 30, 2010 which they felt would cover the students who were in school in 2006-2007."** (Rea Ramsdell, 2013)
- The clause of the Rule 7 (ii) (*see PowerPoint slides*) confirm the reason for the confusion that our director, and Dr. Watson, had over why we would be subject to the exam requirement.
- The LARA administrative employee turnover between 2007 and 2011, along with the changes in how TLLP & LLP applications were submitted, makes it clear that too many details of this rule change were left up for interpretation by the people handling applications, the program directors, and the board of Psychology as well.

RECENT DEVELOPMENTS:

- Kim Gaedeke, present director of licensing, sent email to TLLP license holders in February 2017, with new deadlines for passing the exam. Keep in mind, these changes are **NOT** part of the current administrative rules, or Public Health Code.
- Failure to pass the exam by August 31, 2017 (for some TLLP's) or the next expiration date for those whose date falls after August 31, 2017, results in immediate revocation of our license, removing our ability to practice. Following August 31, 2017, we get ONE chance to pass the exam or our licenses are revoked.
- 60+ master's level psychologists who have been practicing for the past 7 years, are in jeopardy of losing our ability to continue to help our clients in need. A conservative estimate of clients negatively impacted using a figure of 60 clinicians, is 9000-11,000 plus per year.